

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND (BALTIMORE)**

CIMON LOVESS,
Plaintiff,

CASE NO.

vs.

EXPERIAN INFO SOLS, INC;
TRANSUNION, LLC;
LEXISNEXIS RISK SOLS INC.;
and REED ELSEVIER, INC.;
Defendants.

TRANS UNION, LLC'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC ("Trans Union") hereby removes the subject action from the Circuit Court for Baltimore County, Maryland, to the United States District Court for the District of Maryland, on the following grounds:

1. Plaintiff Cimon Lovess served Trans Union on or about October 25, 2016, with a Summons and Complaint filed in the Circuit Court for Baltimore County, Maryland. Copies of the Summons and Complaint are attached hereto as **Exhibit A** and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.

2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the "FCRA"). See Complaint ¶¶ 25-40.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Circuit Court for Baltimore County, Maryland, to the United States District Court for the District of Maryland.

5. Trans Union has confirmed with the Clerk of the Circuit Court for Baltimore County, Maryland, both online and by telephone, that they have no document or file suggesting any other Defendant has been served. To the best of Trans Union's knowledge, no other named Defendant in this matter has been served as of the date and time of this Notice Of Removal.

6. Notice of this removal will promptly be filed with the Circuit Court for Baltimore County, Maryland and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the Circuit Court for Baltimore County, Maryland to this United States District Court, District of Maryland.

Respectfully submitted,

/s/ H. Mark Stichel

H. Mark Stichel, Esq. (MD Federal Bar #02939)
Gohn Hankey Stichel & Berlage, LLP
201 North Charles Street, Suite 2101
Baltimore, MD 21201
Telephone: (410) 752-9300
Fax: (410) 752-2519
E-Mail: hmstichel@ghslp.com

Counsel for Defendant, Trans Union, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **27th day of October, 2016**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

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| None. | |
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The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **27th day of October, 2016**, properly addressed as follows:

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| <u>Pro Se Plaintiff</u> Cimon Lovess 5546 Channing Road Baltimore, MD 21229 | |
|---|--|

/s/ H. Mark Stichel

H. Mark Stichel, Esq. (MD Federal Bar #02939)
Gohn Hankey Stichel & Berlage, LLP
201 North Charles Street, Suite 2101
Baltimore, MD 21201
Telephone: (410) 752-9300
Fax: (410) 752-2519
E-Mail: hmstichel@ghsllp.com

Counsel for Defendant, Trans Union, LLC